West Sussex/South Downs National Park Authority Minerals Site Assessment

Environment Agency comments, November 2015

Further to our meeting on 4th November below are some further comments in relation to the short list of sites.

With regard to Chantry Lane extension, Ham Farm, and Land Adjacent to Hoathly Bricks we have no further comments to make. We are satisfied that the requirements in the overarching Minerals Plan policy on Water Quality and Quantity will ensure that any planning application is supported by sufficient assessment and consideration.

Of those sites remaining the following present specific risks to the water environment which we would like to see addressed. Ideally we would wish for these to be addressed prior to the site being allocated, however, with some changes to the site boundaries and the inclusion of specific development principles for those sites we would be satisfied with the allocations at this stage.

a. East of West Heath Common

The site lies above Marehill Clay above Folkestone Beds (Principal Aquifer). The groundwater levels are likely to be high. The site boundary currently lies adjacent to a Main River. Several surface water drains also run through the site.

We would recommend that a Risk Assessment of the Water Environment (Qualitative Hydrological &Hydrogeological Risk Assessment) Phase 1 is carried out prior to allocation of the site. However, where this is not possible we would wish to see the realignment of the southern boundary to north of the east-west drain on the southern half of the site.

With the revised site boundary the policy should include the following development principles:

- The planning application will be supported by a Hydrological Risk Assessment which will fully assess the operational impacts of the proposed quarrying. Where necessary changes to the development boundary will be made to prevent impacts on the water environment.
- The application will provide confirmation of the depth of quarrying.
- Where possible mineral working should be carried out above the groundwater table. However, where dewatering operations are expected then a full assessment needs to be provided.

b. Minsted

The site lies on Folkestone Beds. The groundwater levels are likely to be high.

We would recommend that a Risk Assessment of the Water Environment (Qualitative Hydrological & Hydrogeological Risk Assessment) Phase 1 is carried out prior to allocation.

However, where this is not possible we would wish the following development principles to be included in the policy.

- The planning application will be supported by a Hydrological Risk Assessment which will fully assess the operational impacts of the proposed quarrying. Where necessary changes to the development boundary will be made to prevent impacts on the water environment.

- The assessment will consider the impacts of the mineral working on the adjacent Iping Common SSSI and develop mitigation measures to prevent any deterioration.
- The application will provide confirmation of the depth of quarrying.
- Where possible mineral working should be carried out above the groundwater table. However, where dewatering operations are expected then a full assessment needs to be provided.

c. Severals West

The site lies on Folkestone Beds. The groundwater levels are likely to be high. The site boundary lies adjacent to a main river. Several surface water drains also run through the site. The whole site is forested.

We would recommend that a Risk Assessment of the Water Environment (Qualitative Hydrological & Hydrogeological Risk Assessment) Phase 1 is carried out prior to allocation. However, where this is not possible we would wish to see the realignment of the western boundary to provide a 50 metre buffer of the floodplain.

In addition to the realignment the following development principles should be included within the policy:

- The planning application will be supported by a Hydrological Risk Assessment which will fully assess the operational impacts of the proposed quarrying. Where necessary changes to the development boundary will be made to prevent impacts on the water environment.
- With the removal of the forest cover, the hydrological regime of the site will change and the impacts from this will need to be assessed in the HRA including increased local flood risk.
- The catchment of the southern surface water features is not known. If the watercourse captures water from areas outside the quarry boundary, preservation or realignment of this water course needs to be assessed.
- The application will provide confirmation of the depth of quarrying.
- Where possible mineral working should be carried out above the groundwater table. However, where dewatering operations are expected then a full assessment needs to be provided.

Rock Common

As discussed the current situation at Rock Common is complex. The relationship between the existing landfill sites in the area and the current quarrying operations has the potential to have a significant impact on the water environment. If the quarry was to be restored as expected, through turning off current dewatering operations, there is a risk that the groundwater would rise through the neighbouring landfill site and cause pollution of the important water resource in the area. In addition water from the quarry is currently pumped into the Honeybridge Stream and provides significant base flow for that watercourse.

We are working with the operators of the sites to raise awareness of these issues. However, it should be noted that the current proposals for the restoration of the quarry may not be possible.

We would support that a further extension to the Rock Common quarry is not included within the Minerals Local Plan at this time. If you require any further information please let me know.

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